

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION**

<b>In Re:</b>	§	
	§	
<b>GARCIA GRAIN TRADING CORP.,</b>	§	<b>Case No. 23-70028-EVR-11</b>
	§	
<b>Debtor.</b>	§	
	§	
<b>RICHARD S. SCHMIDT, TRUSTEE OF THE GARCIA GRAIN CHAPTER 11 TRUST,</b>	§	
	§	
<b>Plaintiff</b>	§	<b>Adversary No. _____</b>
	§	
<b>v.</b>	§	
	§	
<b>FAUSTO SALINAS and F&amp;T FARMS &amp; CATTLE, CO.,</b>	§	
	§	
<b>Defendants</b>	§	

**COMPLAINT TO RECOVER PROPERTY OF THE ESTATE  
PURSUANT TO 11 U.S.C. § 542(b)**

TO THE HONORABLE EDUARDO V. RODRIGUEZ, U.S. Bankruptcy Judge:

NOW COMES, RICHARD S. SCHMIDT, TRUSTEE OF THE GARCIA GRAIN CHAPTER 11 PLAN TRUST (“**Schmidt**” or “**Plaintiff**”), who is the Trustee of the Plan Trust and the former Chief Restructuring Officer (CRO) of the Debtor, GARCIA GRAIN TRADING CORP. (the “**Debtor**” or “**Garcia Grain**”) in the above-captioned case, and files this Complaint to Recover Property of the Estate Pursuant to 11 U.S.C. § 542(b) against Defendants, FAUSTO SALINAS (“**Salinas**”) and F&T FARMS & CATTLE, CO. (“**F&T**”) (collectively “**Defendants**”), and pursuant to FED. R. BANKR. PROC. 7001 and 11 U.S.C. § 542(b), and other applicable law,

would show as follows:

**I.**  
**PARTIES**

1. The Plaintiff in this action is Richard S. Schmidt, as Trustee of the Garcia Grain Chapter 11 Plan Trust (“**Schmidt**” or “**Plaintiff**”), who is the former Chief Restructuring Officer (CRO) of the Debtor, Garcia Grain Trading Corporation (the “**Debtor**” or “**Garcia Grain**”) in the underlying Bankruptcy Case. Schmidt, in his capacity as the Trustee of the Garcia Grain Chapter 11 Plan Trust, is an individual residing in Texas, and can be served at 555 N. Carancahua St. Ste 331, Corpus Christi, Nueces County, Texas 78401.
2. Defendant, FAUSTO SALINAS (“**Salinas**”) is an individual residing at 2104 Western Rd., Mission, Hidalgo County, Texas, 78572-8990 and may be served through his attorney of record, Jose W. Hernandez, Esq. of Law Office of Jose W. Hernandez, PLLC, 206 W. Stubbs Street, Edinburg, Hidalgo County, Texas 78539 [see Bankruptcy Dkt #568 filed on November 30, 2023].
3. Defendant F&T FARMS & CATTLE, CO. (“**F&T**”) is a Texas corporation with its principal place of business at 2104 Western Rd., Mission, Hidalgo County, Texas, 78572-8990, and mailing address at P.O. Box 308, Sullivan City, Texas 78595, may be served through its attorney of record, Jose W. Hernandez, Esq. of Law Office of Jose W. Hernandez, PLLC, 206 W. Stubbs Street, Edinburg, Hidalgo County, Texas 78539 [see Bankruptcy Dkt #568 filed on November 30, 2023].

**II.**  
**JURISDICTION AND VENUE**

4. This Court has subject matter jurisdiction over this Adversary Proceeding pursuant to 28 U.S.C. § 1334 and Bankruptcy Rule 7001 because the claims and causes of action asserted in this Complaint arise in and under Title 11, and relate to cases filed under Title 11 and pending in the United States Bankruptcy Court for the Southern District of Texas, McAllen Division, under Case No. 23-70028-EVR-11.
5. The claims and causes of action set forth herein concern the turnover of estate property under 11 U.S.C. § 542(b). Accordingly, this adversary proceeding is a “core” proceeding to be heard and determined by the Bankruptcy Court pursuant to 28 U.S.C. § 157(b)(2)(E). Plaintiff consents to entry of a final judgment by this Court.
6. Venue is appropriate in this jurisdiction pursuant to 28 U.S.C. § 1409.

**III.**  
**PLAINTIFF’S EXHIBITS**

7. Plaintiff attaches the following exhibits to this Complaint:  
  
**Exhibit A** – Garcia Grain Invoice No. 19538 (\$63,138.55) and Invoice No. 19593 (\$31,134.72)  
  
**Exhibit B** – Garcia Grain Summary of Goods and Services Provided to Defendants  
  
**Exhibit C** – Garcia Grain Demand Letter to Defendants (November 6, 2023)  
  
**Exhibit D** – Attorney Response to Demand Letter (January 18, 2024)
8. In addition, Plaintiff attaches the sworn Affidavit of Octavio Garcia, the principal of the Debtor.

**IV.**  
**BACKGROUND OF THE CASE AND FACTS**

9. On February 17, 2023 (the “**Petition Date**”), the Debtor filed its voluntary petition for relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. § 101, et seq. (the “**Bankruptcy Code**”).
10. On August 15, 2023, Plaintiff, Richard S. Schmidt, was appointed the Chief Restructuring Officer (CRO) of the Debtor, Garcia Grain Trading Corporation, by the Court’s Agreed Order Granting Debtor’s Emergency Motion to Employ Richard S. Schmidt, Retired U.S. Bankruptcy Judge as Its Chief Restructuring Officer [Dkt #429].
11. On February 26, 2024, the Debtor filed Debtor’s Modified and Supplemented Third Amended Chapter 11 Plan of Reorganization (“**Plan**”) [Bankruptcy Dkt #762], which was confirmed on March 5, 2024 [Bankruptcy Dkt #845]. Plaintiff, Richard S. Schmidt, was named the Trustee of the Garcia Grain Chapter 11 Plan Trust which was created pursuant to the terms of the Plan. Under the terms of the Plan, all causes of action, whether asserted or unasserted, belonging to the bankruptcy estate have been transferred to Richard S. Schmidt, the Trustee of the Garcia Grain Chapter 11 Plan Trust. It is under this authority that Plaintiff is bringing this action.
12. Prior to the Petition Date, Garcia Grain, sold fertilizer and agricultural chemicals and provided labor and transportation to Salinas and F&T. In exchange for the goods and services provided, Defendants, Salinas and F&T, agreed to pay Garcia Grain a total amount of **\$94,273.27** for Garcia Grain’s delivery of fertilizer and agricultural chemicals to Salinas between February 24, 2022 and September 28, 2022 (\$63,138.55 for Invoice No. 19538) and work done between May 25, 2022 and December 30, 2022



(\$31,134.72 for Invoice No. 19593). However, Defendants failed to pay Garcia Grain for those sums as agreed.

13. On November 6, 2023, Plaintiff sent Salinas and F&T a Demand Letter demanding payment for the amount. However, as of the filing of this Petition, Defendants, Salinas and F&T, failed to pay Garcia Grain the amounts due and owing.
14. In support, Plaintiff attaches “**Exhibit A**” showing unpaid charges for Garcia Grain’s delivery of fertilizer and agricultural chemicals to Salinas between February 24, 2022 and September 28, 2022 (\$63,138.55 for Invoice No. 19538) and work done between May 25, 2022 and December 30, 2022 (\$31,134.72 for Invoice No. 19593) totaling **\$94,273.27**, “**Exhibit B**” showing the summary of goods and services corresponding to those charges, “**Exhibit C**” showing the Demand Letter sent to Salinas and F&T on November 6, 2023, and “**Exhibit D**” showing Attorney Jose W. Hernandez’s Response to the Demand Letter on January 18, 2024.

V.  
**CAUSES OF ACTION**

**COUNT ONE – Breach of Contract**

15. Plaintiff incorporates the allegations and assertions of fact contained in paragraphs 1 through 14 above and elsewhere in this Complaint.
16. Debtor and Defendants had a valid contract for goods and services.
17. Debtor sold goods to and performed services for Salinas and F&T under the contract. *See Exhibit A and B.* Specifically, Debtor, Garcia Grain, sold fertilizer and agricultural chemicals and had them delivered to the premises of Defendants. In exchange for the goods and services provided, Defendants agreed to pay Garcia Grain **\$94,273.27**.

18. On November 6, 2023, Plaintiff sent Defendants, Salinas and F&T, a Demand Letter (*see* “**Exhibit C**”) to which Defendants responded through their attorney, Jose W. Hernandez, on January 18, 2024 (*see* “**Exhibit D**”); but Defendants failed to pay the amounts due.
19. Defendants have materially breached the contract by failing to pay Plaintiff for goods provided and services rendered.
20. Plaintiff has been damaged by Defendants’ breach in the amount of the money owed, plus attorney’s fees, costs and expenses of filing this suit. For this cause of action, Plaintiff seeks liquidated damages as well as pre- and post-judgment interest at the highest lawful rate, attorney’s fees, costs and expenses.

**COUNT TWO – Quantum Meruit**

21. Plaintiff incorporates the allegations and assertions of fact contained in paragraphs 1 through 20 above and elsewhere in this Complaint.
22. In addition or in the alternative to the cause of action for breach of contract, Salinas and F&T are bound by an implied agreement to pay Garcia Grain for the goods and services it accepted and received from Garcia Grain. (*See Exhibits A and B*). Despite receiving the Demand Letter (*see Exhibit C*) and responding to it (*see Exhibit D*), Defendants, Salinas and F&T, have not paid Garcia Grain for the amounts due.
23. Defendants knew or should have known that Garcia Grain expected compensation for these goods and services.
24. Quantum meruit is an equitable theory of recovery intended to prevent unjust enrichment when there is an implied agreement to pay for benefits received. *Hill v. Shamoun & Norman, LLP*, 544 S.W.3d 724, 732 (Tex. 2018).

25. Plaintiff has been damaged by Defendants' breach in the amount of the money owed, plus attorney's fees. For this cause of action, Plaintiff seeks liquidated damages as well as pre- and post-judgment interest at the highest lawful rate, attorney's fees, costs and expenses.

**COUNT THREE – Suit on an Account**

26. Plaintiff incorporates the allegations and assertions of fact contained in paragraphs 1 through 25 above and elsewhere in this Complaint.
27. Although, strictly speaking, "suit on sworn account" is a procedural device to pursue a contractual claim under TEX. R. CIV. P. 185, which is a procedural rule not binding in federal courts, nevertheless, regardless of whether this cause of action is called "suit on account," "suit on an open account," or "suit on sworn account," case law indicates that it is an underlying substantive cause of action separate from TEX. R. CIV. P. 185 and therefore recognized in federal courts, and it is under this cause of action that Plaintiff brings this claim. *See SM Energy Co. v. Smackco, Ltd.*, No. 11-CV-3028, 2012 WL 4760841, at \*5 (S.D. Tex. Oct. 5, 2012) (citing *Sunshine Traders of El Paso, Inc. v. Dolgencorp, Inc.*, 219 Fed. Appx. 375, 377 (5th Cir.2007)).
28. Debtor, Garcia Grain, sold goods and services, i.e., sold fertilizer and agricultural chemicals and provided labor and transportation, to Salinas and F&T, Defendants, for the benefit of the Defendants. (See **Exhibits A and B**). The prices charged were just and true because they were the usual, customary, and reasonable prices for the type of work and the goods and services provided for this type of transaction. Debtor kept a systematic record of the transactions at issue. (See **Exhibits A and B**). All lawful offsets, payments, and credits have been applied to the account. The account remains unpaid.

29. Plaintiff files this petition under oath, as shown by the attached verification. (*See the Affidavit of Octavio Garcia attached to this Complaint and incorporated herein for all purposes*).
30. On November 6, 2023, Plaintiff sent Defendants, Salinas and F&T, a Demand Letter (*see “Exhibit C”*) which was received by Defendants and Defendants responded to it through their attorney on January 18, 2024 (*see “Exhibit D”*). As a result of Defendants’ failure to pay, Plaintiff suffered liquidated damages in the principal amount of \$94,273.27.
31. For this cause of action, Plaintiff seeks liquidated damages as well as pre- and post-judgment interest at the highest lawful rate, attorney’s fees, costs and expenses.

**VI.**  
**ATTORNEY’S FEES**

32. Plaintiff presented its demand for payment to Defendants, but Plaintiff’s demand has gone unpaid. As a result of Defendants’ failure to pay, as described above, Plaintiff was forced to hire the undersigned attorneys to prosecute this cause of action, and it has agreed to pay its attorneys’ reasonable and necessary fees and expenses in order to do so. Pursuant to TEX. CIV. PRAC. & REM. CODE Chapter 38, Plaintiff is entitled to recover reasonable and necessary attorney fees and expenses for having to bring this action because this suit is for a sworn or open account or an oral or written contract.

**PRAYER FOR RELIEF**

WHEREFORE, the Plaintiff RICHARD S. SCHMIDT, TRUSTEE OF THE GARCIA GRAIN CHAPTER 11 PLAN TRUST, (“**Plaintiff**”) prays that citation be issued against Defendants, FAUSTO SALINAS (“**Salinas**”) and F&T FARMS & CATTLE, CO. (“**F&T**”), and that Defendants be required to answer this Complaint, and that upon trial of this cause that the

Court enter judgment against the Defendants pursuant to 11 U.S.C. § 542(b) and all applicable law, finding the amount due to Plaintiff totaling **\$94,273.27** to be property of Garcia Grain's bankruptcy estate, ordering the amount of \$94,273.27 be turned over to the Garcia Grain Chapter 11 Plan Trust, allowing for recovery of reasonable and necessary attorney's fees, and for such other relief as the Court deems just and equitable.

Respectfully Submitted,

MULLIN HOARD & BROWN, L.L.P.  
P.O. Box 2585  
Lubbock, Texas 79408-2585  
Telephone: (806) 765-7491  
Facsimile: (806) 765-0553  
Email: [drl@mhba.com](mailto:drl@mhba.com)

/s/ David R. Langston

David R. Langston, SBN: 11923800

Southern District Bar No. 9489

Özen E. Zimmerman, SBN: 24097659

Southern District Bar No: 3846489

***Attorneys for the Debtor, Garcia Grain Trading Corp.***


## **VERIFICATION AND EXHIBITS**



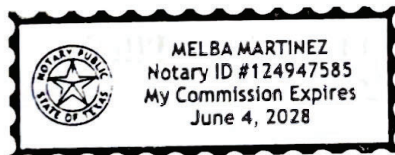
offsets, payments or credits have been applied to said invoices. The charges listed on the invoices are reasonable and customary for the goods and services provided to Salinas and F&T or any other similarly situated individuals or companies in the region.

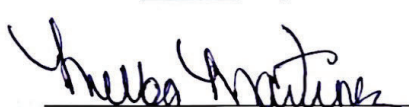
9. "As of this date, the Claim Amount remains unpaid. On November 6, 2023, Plaintiff sent Salinas and F&T a letter ("**Demand Letter**") demanding payment for the unpaid bills, a copy of which has been attached to this Complaint as **Exhibit C**. Despite receiving the Demand Letter, as evidenced by their Response to Demand Letter sent through their attorney on January 18, 2024, *see Exhibit D*, Salinas and F&T have not paid the amount due.
10. "I have read the foregoing Complaint to Recover Property of the Estate Pursuant to 11 U.S.C. § 542(b) (the "**Complaint**") against Salinas and F&T, and every statement of fact therein is within my personal knowledge or based on my review of the records, and such facts are true and correct.
11. "The Claim Amount, attached as **Exhibits A** and **B** to the Complaint, is a true and correct copy of Salinas and F&T's account with Garcia Grain, showing a total principal balance due and owing to Garcia Grain of \$94,273.27, after all just and lawful payments, credits, and offsets."

FURTHER, AFFIANT SAYETH NAUGHT.

  
OCTAVIO GARCIA

SWORN TO and SUBSCRIBED before me on this the 19 day of December 2024, by OCTAVIO GARCIA.



  
Notary Public in and for the  
State of Texas



	SUBTOTAL	63,138.55
Tax rate %		0.00
SHIPPING / HANDLING		
PAYMENTS		
	AMOUNT DUE	63,138.55

[illegible]

**GARCIA GRAIN TRADING, CORP.****FARMERS SEED & FERTILIZER 2022****FARMER NAME:**

FARMER NAME	FECHA	INV	PRODUCT	QUANT	PRICE	TOTAL	PO #	
FAUSTO SALINAS	8/25/2022	52949126	THIDIAZURON	1	\$164.77	\$164.77	19249	HELENA
FAUSTO SALINAS	9/28/2022	52949673	2 4-D	265	\$25.57	\$6,775.55	19262	HELENA
FAUSTO SALINAS	9/28/2022	52949673	ROUNDUP	265	\$57.39	\$15,207.34	19262	HELENA
FAUSTO SALINAS	9/28/2022	52949673	SHARPEN	4	\$872.72	\$3,490.90	19262	HELENA
FAUSTO SALINAS	3/18/2022	19092	30-12-7+3.1	240	78	\$ 18,720.00	3278	VITAL
FAUSTO SALINAS	5/30/2022	19194	30-12-7	160	78	\$ 12,480.00	3375	VITAL
FAUSTO SALINAS	6/10/2022	19211	VITAL GRASSLAND	80	35	\$ 2,800.00	3394	VITAL
FAUSTO SALINAS	6/10/2022	19211	VITAL NITRO	20	35	\$ 700.00	3394	VITAL
FAUSTO SALINAS	8/4/2022	19243	14-21-7	40	35	\$ 1,400.00	3421	VITAL
FAUSTO SALINAS	8/4/2022	19243	28-7-14	40	35	\$ 1,400.00	3421	VITAL
						\$63,138.55		

**GARCIA GRAIN TRADING, CORP.****FARMERS SEED & FERTILIZER 2022****FARMER NAME:**

FARMER NAME	FECHA	INV	PRODUCT	QUANT	PRICE	TOTAL	PO #	
FAUSTO SALINAS	2/24/2022	52945930	ROUNDUP	265	\$69.00	\$18,285.00	19033	HELENA
FAUSTO SALINAS	2/24/2022	52945930	SHARPEN	4	\$870.00	\$3,480.00	19033	HELENA
FAUSTO SALINAS	3/21/2022	52946412	ROUNDUP	265	\$69.00	\$18,285.00	19057	HELENA
FAUSTO SALINAS	3/21/2022	52946412	PEAK	240	\$19.25	\$4,620.00	19057	HELENA
FAUSTO SALINAS	3/21/2022	52946412	CLASP	8	\$27.50	\$220.00	19057	HELENA
FAUSTO SALINAS	3/21/2022	52946412	DYNE=AMIC	10	\$55.00	\$550.00	19057	HELENA
FAUSTO SALINAS	3/24/2022	267559211	28-0.0-0.0 5S	25	\$585.00	\$14,625.00	19069	HELENA
FAUSTO SALINAS	3/24/2022	267559211	FREIGHT FERT.	25	\$10.00	\$250.00	19069	HELENA
FAUSTO SALINAS	3/24/2022	267559211	STATE FERT.	25	\$0.36	\$9.00	19069	HELENA
FAUSTO SALINAS	3/24/2022	267559217	28-0.0-0.0 5S	25.011	\$585.00	\$14,631.44	19095	HELENA
FAUSTO SALINAS	3/24/2022	267559217	FREIGHT FERT.	25.01	\$10.00	\$250.10	19095	HELENA
FAUSTO SALINAS	3/24/2022	267559217	STATE FERT.	25.01	\$0.36	\$9.00	19095	HELENA
FAUSTO SALINAS	3/24/2022	267559214	28-0.0-0.0 5S	25.01	\$580.00	\$14,505.80	19086	HELENA
FAUSTO SALINAS	3/24/2022	267559214	FREIGHT FERT.	25.01	\$20.00	\$500.20	19086	HELENA
FAUSTO SALINAS	3/24/2022	267559214	STATE FERT.	25.01	\$0.36	\$9.00	19086	HELENA
FAUSTO SALINAS	3/25/2022	52946529	SHARPEN	8	\$222.00	\$1,776.00	19060	HELENA
FAUSTO SALINAS	5/12/2022	267559957	28-0.0-0.0 5S	25	\$585.00	\$14,625.00	19069	HELENA
FAUSTO SALINAS	5/12/2022	267559957	FREIGHT FERT.	25	\$10.00	\$250.00	19069	HELENA
FAUSTO SALINAS	5/12/2022	267559957	STATE FERT.	25	\$0.36	\$9.00	19069	HELENA
FAUSTO SALINAS	6/22/2022	52948290	ACEPHATE 97	80	\$10.00	\$800.00	19219	HELENA
FAUSTO SALINAS	6/22/2022	52948290	ENC FLEX 11-6-5	35	\$18.50	\$647.50	19219	HELENA
FAUSTO SALINAS	6/23/2022	52948360	LIBERTY	15	(\$82.50)	(\$1,237.50)		HELENA
FAUSTO SALINAS	8/12/2022	52948940	FLASH	25	\$46.00	\$1,150.00	19435	HELENA
						\$108,249.54		



# F & T FARM & CATTLE YELLOW CORN SETTLEMENT

DATE	TICKET	FIELD TK	LIC.	LOT	MOISTU	BU. WT.	L NET	PERCE	WEIGHT	PRICE	CO PRICE	TOTAL	ADVANCE	BALANCE
7/11/2022	1602	223064	FDJ-J67	FARM 23915 TRACT 137515/1	11	56.8	56,900	1.000	56,900	\$ 15.00	\$ 15.00	\$ 8,535.00		\$ 8,535.00
7/11/2022	1604	215925	DDY-F85	FARM 23915 TRACT 137515/1	11	55.8	62,380	1.000	62,380	\$ 15.00	\$ 15.00	\$ 9,357.00	\$ -	\$ 17,892.00
7/10/2022	7791	223063	FDJ-J67	FARM 23915 TRACT 137515/1	10.7	53.7	55,240	1.000	55,240	\$ 15.00	\$ 15.00	\$ 8,286.00	\$ -	\$ 26,178.00
7/13/2022	7984	215929	DDY-F85	FARM 23915 TRACT 137515/1	12	60.5	63,480	1.000	63,480	\$ 15.00	\$ 15.00	\$ 9,522.00	\$ -	\$ 35,700.00
7/13/2022	7991	223075	X36-89X	FARM 23915 TRACT 137515/1	11.6	58.1	69,340	1.000	69,340	\$ 15.00	\$ 15.00	\$ 10,401.00	\$ -	\$ 46,101.00
7/13/2022	7995	218606	FDJ-J67	FARM 23915 TRACT 137515/1	10.8	56.3	58,380	1.000	58,380	\$ 15.00	\$ 15.00	\$ 8,757.00	\$ -	\$ 54,858.00
7/19/2022	8210	223083	X36893	WASSER FARM 27081	11.2	58.3	54,360	1.000	54,360	\$ 15.00	\$ 15.00	\$ 8,154.00	\$ -	\$ 63,012.00
7/6/2022	74249	215911	DDY-F85	FARM 3115 & 81	12.8	58	16,500	1.000	16,500	\$ 15.00	\$ 15.00	\$ 2,475.00	\$ -	\$ 65,487.00
7/6/2022	74256	215911	DDY-F85	FARM 3118	12.8	58	5,500	1.000	5,500	\$ 15.00	\$ 15.00	\$ 825.00	\$ -	\$ 66,312.00
7/6/2022	74257	215911	DDY-F85	FARM 23915 TRACT 137325	12.8	58	37,300	1.000	37,300	\$ 15.00	\$ 15.00	\$ 5,595.00	\$ -	\$ 71,907.00
7/6/2022	74291	215912	DDY-F85	FARM 27721	11.5	58.2	60,380	1.000	60,380	\$ 15.00	\$ 15.00	\$ 9,057.00	\$ -	\$ 80,964.00
7/7/2022	74335	215913	DDY-F85	FARM 27721	11.5	58.5	56,300	1.000	56,300	\$ 15.00	\$ 15.00	\$ 8,445.00	\$ -	\$ 89,409.00
7/7/2022	74363	215914	DDY-F85	FARM 27721	11.7	58.8	53,660	1.000	53,660	\$ 15.00	\$ 15.00	\$ 8,049.00	\$ -	\$ 97,458.00
7/7/2022	74395	215915	DDY-F85	FARM 27721	12.1	57.7	56,120	1.000	56,120	\$ 15.00	\$ 15.00	\$ 8,418.00	\$ -	\$ 105,876.00
7/8/2022	74410	223051	FDJ-J67	FARM 27721	13.5	58.7	57,920	1.000	57,920	\$ 15.00	\$ 15.00	\$ 8,688.00	\$ -	\$ 114,564.00
7/8/2022	74431	215916	DDY-F85	FARM 27721	12.3	57.2	50,700	1.000	50,700	\$ 15.00	\$ 15.00	\$ 7,605.00	\$ -	\$ 122,169.00
7/8/2022	74436	223052	FDJ-J67	FARM 23771	12.2	57.1	52,600	1.000	52,600	\$ 15.00	\$ 15.00	\$ 7,890.00	\$ -	\$ 130,059.00
7/8/2022	74462	215917	DDY-F85	FARM 23771	12.3	57.7	52,900	1.000	52,900	\$ 15.00	\$ 15.00	\$ 7,935.00	\$ -	\$ 137,994.00
7/8/2022	74495	215918	DDY-F85	FARM 26761	12.4	57.7	64,020	1.000	64,020	\$ 15.00	\$ 15.00	\$ 9,603.00	\$ -	\$ 147,597.00
7/10/2022	74627	215923	DDY-F05	FARM 26761	11.4	54.9	61,820	1.000	61,820	\$ 15.00	\$ 15.00	\$ 9,273.00	\$ -	\$ 156,870.00
7/11/2022	74656	223067	FDJ-J67	FARM 23914	10.8	59.9	59,780	1.000	59,780	\$ 15.00	\$ 15.00	\$ 8,967.00	\$ -	\$ 165,837.00
7/11/2022	74657	223066	X36-893	FARM 23914	10.2	56.8	63,220	1.000	63,220	\$ 15.00	\$ 15.00	\$ 9,483.00	\$ -	\$ 175,320.00
7/11/2022	74660	215926	DDY-F85	FARM 23914	10.6	60	63,640	1.000	63,640	\$ 15.00	\$ 15.00	\$ 9,546.00	\$ -	\$ 184,866.00
7/12/2022	74673	223068	FDJ-J67	FARM 23914	10.5	58.8	62,540	1.000	62,540	\$ 15.00	\$ 15.00	\$ 9,381.00	\$ -	\$ 194,247.00
7/12/2022	74683	223069		FARM 23914	10.5	59	67,940	1.000	67,940	\$ 15.00	\$ 15.00	\$ 10,191.00	\$ -	\$ 204,438.00
7/12/2022	74693	215927	DDY-F85	QOT 27307	11.7	57.8	64,580	1.000	64,580	\$ 15.00	\$ 15.00	\$ 9,687.00	\$ -	\$ 214,125.00
7/12/2022	74701	223070	FDJ-J67	QOT 27307	12	59.6	63,880	1.000	63,880	\$ 15.00	\$ 15.00	\$ 9,582.00	\$ -	\$ 223,707.00
7/12/2022	74721	223071		QOT 27307	10.9	59.7	74,980	1.000	74,980	\$ 15.00	\$ 15.00	\$ 11,247.00	\$ -	\$ 234,954.00
7/13/2022	74760-A	215928	DDY-F85	QOT 27307	11.5	58.9	43,007	1.000	43,007	\$ 15.00	\$ 15.00	\$ 6,451.05	\$ -	\$ 241,405.05
7/13/2022	74760-	215928	DDY-F85	WOODS 19785	11.5	58.9	5,568	1.000	5,568	\$ 15.00	\$ 15.00	\$ 835.20	\$ -	\$ 242,240.25
7/13/2022	74760-C	215928	DDY-F85	MOSSAR 26379	11.5	58.9	2,860	1.000	2,860	\$ 15.00	\$ 15.00	\$ 429.00	\$ -	\$ 242,669.25
7/13/2022	74760-D	215928	DDY-F85	TACK 27568	11.5	58.9	8,965	1.000	8,965	\$ 15.00	\$ 15.00	\$ 1,344.75	\$ -	\$ 244,014.00
7/13/2022	74764	NO FIELD	FDJ-J67	WASSER FARM 27081	11.5	60.6	60,460	1.000	60,460	\$ 15.00	\$ 15.00	\$ 9,069.00	\$ -	\$ 253,083.00
7/13/2022	74814	223074	FDJ-J67	WASSER FARM 27081	12	60.2	58,880	1.000	58,880	\$ 15.00	\$ 15.00	\$ 8,832.00	\$ -	\$ 261,915.00
7/13/2022	74848	215930	DDY-F85	WASSER FARM 27081	10.7	59.2	66,160	1.000	66,160	\$ 15.00	\$ 15.00	\$ 9,924.00	\$ -	\$ 271,839.00
10/18/2022	LESS ASSESSMENT							1.000	-	\$ -	\$ -	\$ -	\$ 323.62	\$ 271,515.38
10/18/2022	LESS HAULING							1.000	-	\$ -	\$ -	\$ -	\$ 9,061.30	\$ 262,454.08

## F & T FARM & CATTLE YELLOW CORN SETTLEMENT

DATE	TICKET	FIELD TK	LIC.	LOT	MOISTU	BU. WT.	L NET	PERCE	WEIGHT	PRICE	CO PRICE	TOTAL	ADVANCE	BALANCE
10/18/2022	PD CHECK	7353						1.000	-	\$ -	\$ -	\$ -	\$ 52,490.82	\$ 209,963.27
10/18/2022	PD CHECK	7354						1.000	-	\$ -	\$ -	\$ -	\$ 52,490.82	\$ 157,472.45
10/18/2022	PD CHECK	7355						1.000	-	\$ -	\$ -	\$ -	\$ 52,490.82	\$ 104,981.63
10/18/2022	PD CHECK	7356						1.000	-	\$ -	\$ -	\$ -	\$ 52,490.82	\$ 52,490.81
10/18/2022	PD CHECK	7357						1.000	-	\$ -	\$ -	\$ -	\$ 52,490.82	\$ (0.01)
								1.000	-	\$ -	\$ -	\$ -	\$ -	\$ (0.01)
								1.000	-	\$ -	\$ -	\$ -	\$ -	\$ (0.01)
						-	-	1.000	-	\$ -	\$ -	\$ -	\$ -	\$ (0.01)
						-	-	1.000	-	\$ -	\$ -	\$ -	\$ -	\$ (0.01)
			F & T FARM & CATTLE YELLOW CORN SETTLEMENT				1,812,260		1,812,260	\$ -	\$ -	\$ 271,839.00	\$ 271,839.01	\$ (0.01)

OK as per R. Perez.

GARCIA GRAIN TRADING CORPORATION  
PH 956-464-6000  
101 N VAL VERDE RD  
DONNA, TX 78537-9561

7353

PAY TO THE ORDER OF F. J. FARM & CATTLE DATE 11/17/2022 88-152771149  
Two thousand five hundred and no/100 \$52,490.82  
VANTAGE BANK TEXAS  
FOR 40 SELL DOLLARS

⑈007353⑈ ⑆114915272⑆ 2706815114⑈

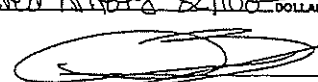
7353 \$52,490.82 12/15/2022

-BranchName=RIO BANK PALMVIEW-Trans=12/14/22-Tri

0910116526  
2022-12-15

BranchName=RIO BANK PALMVIEW  
Trans=12/14/22-Tri  
Trans=12/14/22-Tri

7353 \$52,490.82 12/15/2022

<b>GARCIA GRAIN TRADING CORPORATION</b> PH 956-464-6000 101 N VAL VERDE RD DONNA, TX 78537-9561		7354
PAY TO THE ORDER OF <u>FAT Farms LLC</u> <u>Two thousand four hundred ninety 82/100</u> DOLLARS		DATE <u>11/17/2022</u>
VANTAGE BANK ★ TEXAS FOR <u>YC S.M.</u>		\$52,490.82 
⑈007354⑈ ⑈1114915272⑈ 2700615111⑈		

7354 \$52,490.82 11/23/2022

-BranchName=RIO BANK PALMVIEW-TransID=11/22/22-Tr1 0910772220 2022-11-23	CHECK NO. 1317326 DATE 11/23/2022 AMOUNT \$52,490.82
BP=4-TRID=47 -TransID=11/22/22-ItemNum=047481415111 -BranchName=RIO BANK PALMVIEW	

7354 \$52,490.82 11/23/2022



7355

GARCIA GRAIN TRADING CORPORATION  
PH 956-494-6080  
101 N VAL VERDE RD  
DONNA, TX 78537-9561

DATE 11/11/2022 BB-1527/1149

PAY TO THE ORDER OF F. I. Farms + Calle \$52,490.82

Five thousand four hundred ninety eight and 100/100 DOLLARS

VANTAGE BANK ☆  
41 SELLER

FOR \_\_\_\_\_

⑈007355⑈ ⑆114915272⑆ 2700615144⑈

7355 \$52,490.82 11/23/2022

0910772219  
2022-11-23

BranchName=RIO BANK PALMVIEW-TranOf=11/22/22-Tx1

Br=4-TMO=47  
TranOf=11/22/22-ItemNum=047481415110  
BranchName=RIO BANK PALMVIEW

13/173261

F. I. Farms + Calle

7355 \$52,490.82 11/23/2022

OK as per R. Perez.

7356

GARCIA GRAIN TRADING CORPORATION  
PH: 356-164-6000  
101 N VAL VERDE RD  
DUNN, TX 78537-9561

DATE 11/11/2022

PAY TO THE ORDER OF F.I. Talamo + Calle \$52,490.82

Twenty two thousand four hundred ninety eight and 82/100 DOLLARS

VANTAGE BANK

FOR Y. S. Talamo

⑆007356⑆ ⑆1114915272⑆ ⑆2006151144⑆

7356 \$52,490.82 12/9/2022

BranchName=RIO BANK PALMVIEW-TransDt=12/08/22-Tri

0910493080  
2022-12-09

Br=4-TriD=48  
-TransDt=12/08/22-ItemNum=047481625620  
-BranchName=RIO BANK PALMVIEW

12/7/2022

7356 \$52,490.82 12/9/2022

OK as per Mr. Perez.

GARCIA GRAIN TRADING CORPORATION  
PH.855-464-6000  
101 N VAL VERDE RD  
DONNA, TX 78537-9561

DATE 11/17/2022 88-1527/1149

PAY TO THE ORDER OF F & T Farm + Cattle \$ 52,490.82

Five thousand four hundred ninety 82/100 DOLLARS

VANTAGEBANK ☆  
4C S&H

FOR \_\_\_\_\_

⑈007357⑈ ⑆111915272⑆ 2700615111⑈

7357 \$52,490.82 12/9/2022

BranchName=RIO BANK PALMVIEW-TransID=12/08/22-TN

0910493079  
2022-12-09

Br=4-TrnD=48  
TrnDt=12/08/22-VerNum=047481825819  
BranchName=RIO BANK PALMVIEW

12/17/2022

7357 \$52,490.82 12/9/2022

**Elevator Section**

**Garcia Grain Trading**  
 VALVERDE DIVISION  
 101 N VALVERDE RD  
 DONNA, TX 78537  
**Tel. No.:** 956-464-6000

**Transport Section**

F & T FARM  
 JAIME  
 FDJ-J67

**Customer Section**

F & T FARM & CATTLE  
 AGUA

**Ticket In****1602**

v.2.7

**IN**

07/11/2022 11:55

**OUT**

07/11/2022 12:53

Product	Lot #
Yellow Corn	AGUA

Origin	OrgTicket	OrgWeight
FIELD	223064	

Moisture	11.000
Test Weight	56.800
PPB	.0
Dry Weight %	100.00
Discount/100 LB	\$0.00
Dry Weight	56,900.00

**WEIGHTS**

<b>GROSS</b>	<b>83,220.00</b>
<b>TARE</b>	<b>26,320.00</b>
<b>NET</b>	<b>56,900.00</b>
<b>METRIC TONS</b>	<b>25.810</b>

---

 Driver Signature

---

 Weigher Signature: JUAN PENA

**Elevator Section**

**Garcia Grain Trading**  
 VALVERDE DIVISION  
 101 N VALVERDE RD  
 DONNA, TX 78537  
 Tel. No.: 956-464-6000

**Transport Section**

F & T FARM  
 RUDY  
 DDY-F85

**Customer Section**

F & T FARM & CATTLE  
 AG INT

**Ticket In****1604**

v.2.7

IN		OUT	
07/11/2022	13:16	07/11/2022	13:45

Product	Lot #
Yellow Corn	AG INT

Moisture	11.000
Test Weight	55.800
PPB	.0
Dry Weight %	100.00
Discount/100 LB	\$0.00
Dry Weight	62,380.00

Origin	OrgTicket	OrgWeight
FIELD	215925	

**WEIGHTS**

<b>GROSS</b>	<b>91,640.00</b>
<b>TARE</b>	<b>29,260.00</b>
<b>NET</b>	<b>62,380.00</b>
<b>METRIC TONS</b>	<b>28.295</b>

---

 Driver Signature

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 Weigher Signature: JUAN PENA

**Elevator Section****Garcia Grain Trading**

Edcouch division

Tel. No.: 956-464-6000

**Transport Section**

F &amp; T FARMS

JAIME CANTU

FDJ-J67

**Customer Section**

F&amp;T LAND &amp; CATTLE

AG INT

**Ticket In****7791**

v.2.7

**IN**

07/10/2022 19:16

**OUT**

07/10/2022 20:19

Product	Lot #
Yellow Corn	AG INT

Moisture	10.700
Test Weight	53.700
PPB	.0
Dry Weight %	100.00
Discount/100 LB	\$0.00
Dry Weight	55,240.00

Origin	OrgTicket	OrgWeight
FIELD	223063	

**WEIGHTS****GROSS** 81,520.00**TARE** 26,280.00**NET** 55,240.00**METRIC TONS** 25.057\_\_\_\_\_  
Driver Signature\_\_\_\_\_  
Weigher Signature: Everardo Villarreal

**Elevator Section****Garcia Grain Trading**

Edcouch division

Tel. No.: 956-464-6000

**Transport Section**

F&amp;T LAND &amp; CATTLE

RUDY CERDA

DDY-F85

**Customer Section**

F&amp;T LAND &amp; CATTLE

FLOODWAY

**Ticket In****7984**

v.2.7

**IN**

07/13/2022 15:05

**OUT**

07/13/2022 18:16

Product	Lot #
Yellow Corn	FLOODWAY

Moisture	12.000
Test Weight	60.500
PPB	.0
Dry Weight %	100.00
Discount/100 LB	\$0.00
Dry Weight	63,480.00

Origin	OrgTicket	OrgWeight
FIELD	215929	

**WEIGHTS****GROSS** 92,900.00**TARE** 29,420.00**NET** 63,480.00**METRIC TONS** 28.794\_\_\_\_\_  
Driver Signature\_\_\_\_\_  
Weigher Signature: Everardo Villarreal

**Elevator Section****Garcia Grain Trading**

Edcouch division

Tel. No.: 956-464-6000

**Transport Section**

JC TRANSPORT

JORGE CANTU

X36-89X

**Customer Section**

F&amp;T LAND &amp; CATTLE

FLOODWAY

**Ticket In****7991**

v.2.7

**IN**

07/13/2022 15:47

**OUT**

07/13/2022 18:57

Product	Lot #
Yellow Corn	FLOODWAY

Origin	OrgTicket	OrgWeight
FIELD	223075	

Moisture	11.600
Test Weight	58.100
PPB	.0
Dry Weight %	100.00
Discount/100 LB	\$0.00
Dry Weight	69,340.00

**WEIGHTS**

<b>GROSS</b>	<b>98,000.00</b>
<b>TARE</b>	<b>28,660.00</b>
<b>NET</b>	<b>69,340.00</b>
<b>METRIC TONS</b>	<b>31.452</b>

---

 Driver Signature

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 Weigher Signature: Everardo Villarreal



**Elevator Section****Garcia Grain Trading**

Edcouch division

Tel. No.: 956-464-6000

**Transport Section**

F &amp; T TRANSPORT

JAIME CANTU

FDJ-J67

**Customer Section**

F&amp;T LAND &amp; CATTLE

FLOODWAY

**Ticket In****7995**

v.2.7

**IN**

07/13/2022 16:44

**OUT**

07/13/2022 19:28

Product

Lot #

Yellow Corn	FLOODWAY
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Origin

OrgTicket

OrgWeight

FIELD	218606	
-------	--------	--

Moisture

10.800

Test Weight

56.300

PPB

.0

Dry Weight %

100.00

Discount/100 LB

\$0.00

Dry Weight

58,380.00

**WEIGHTS****GROSS****84,380.00****TARE****26,000.00****NET****58,380.00****METRIC TONS****26.481**\_\_\_\_\_  
Driver Signature\_\_\_\_\_  
Weigher Signature: Everardo Villarreal

**Elevator Section****Garcia Grain Trading**

Edcouch division

Tel. No.: 956-464-6000

**Transport Section**

JC TRANSPORT

ROLANDO CANTU

X36-893

**Customer Section**

F &amp; T FARM &amp; CATTLE

TACK WOODS WEST

**Ticket In****8210**

v.2.7

**IN****OUT**

07/19/2022 10:16

07/19/2022 11:54

Product

Lot #

Yellow Corn

TACK WOODS WEST

Origin

OrgTicket

OrgWeight

FIELD

223083

Moisture 11.200

Test Weight 58.300

PPB .0

Dry Weight % 100.00

Discount/100 LB \$0.00

Dry Weight 54,360.00

**WEIGHTS****GROSS 82,880.00****TARE 28,520.00****NET 54,360.00****METRIC TONS 24.658**\_\_\_\_\_  
Driver Signature\_\_\_\_\_  
Weigher Signature: Everardo Villarreal

**Elevator Section**

**Garcia Grain Trading**  
**PROGRESO DIVISION**  
**Tel. No.: 956-565-2674**

**Transport Section**

**F & T**  
**RUDY CERDA**  
**DDY-F85**

**Customer Section**

**F & T FARM & CATTLE**  
**OMAR SALINAS ST**

**Ticket In****74249**

v.2.7

**IN**

07/06/2022 14:16

**OUT**

07/06/2022 14:54

Product

Lot #

Yellow Corn	OMAR SALINAS ST
-------------	-----------------

Origin

OrgTicket

OrgWeight

FIELD	215911	
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Moisture 12.800

Test Weight 58.000

PPB .0

Dry Weight % 100.00

Discount/100 LB \$0.00

Dry Weight 16,500.00

**WEIGHTS****GROSS 88,000.00****TARE 71,500.00****NET 16,500.00****METRIC TONS 7.484**\_\_\_\_\_  
Driver Signature\_\_\_\_\_  
Weigher Signature: J. ALFREDO TORRES

**Elevator Section**

**Garcia Grain Trading**  
**PROGRESO DIVISION**  
**Tel. No.: 956-565-2674**

**Transport Section**

**F & T**  
**RUDY CERDA**  
**DDY-F85**

**Customer Section**

**F & T FARM & CATTLE**  
**F & T STAR**

**Ticket In****74256**

v.2.7

**IN**

07/06/2022 14:16

**OUT**

07/06/2022 14:54

Product	Lot #
Yellow Corn	F & T STAR

Origin	OrgTicket	OrgWeight
FIELD	215911	

Moisture	12.800
Test Weight	58.000
PPB	.0
Dry Weight %	100.00
Discount/100 LB	\$0.00
Dry Weight	5,500.00

**WEIGHTS****GROSS** 71,500.00**TARE** 66,000.00**NET** 5,500.00**METRIC TONS** 2.495

---

 Driver Signature

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 Weigher Signature: J. ALFREDO TORRES

**Elevator Section**

**Garcia Grain Trading**  
**PROGRESO DIVISION**  
**Tel. No.: 956-565-2674**

**Transport Section**

**F & T**  
**RUDY CERDA**  
**DDY-F85**

**Customer Section**

**F & T FARM & CATTLE**  
**F & T WINOS**

**Ticket In****74257**

v.2.7

**IN**

07/06/2022 14:16

**OUT**

07/06/2022 14:54

Product	Lot #
Yellow Corn	F & T WINOS

Origin	OrgTicket	OrgWeight
FIELD	215911	

Moisture	12.800
Test Weight	58.000
PPB	.0
Dry Weight %	100.00
Discount/100 LB	\$0.00
Dry Weight	37,300.00

**WEIGHTS****GROSS** 66,000.00**TARE** 28,700.00**NET** 37,300.00**METRIC TONS** 16.919

---

 Driver Signature

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 Weigher Signature: J. ALFREDO TORRES

**Elevator Section**

**Garcia Grain Trading**  
**PROGRESO DIVISION**  
**Tel. No.: 956-565-2674**

**Transport Section**

**F & T**  
**RUDY CERDA**  
**DDY-F85**

**Customer Section**

**F & T FARM & CATTLE**  
**LOS WINOS**

**Ticket In****74291**

v.2.7

**IN**

07/06/2022 17:38

**OUT**

07/06/2022 19:36

Product	Lot #
Yellow Corn	LOS WINOS

Origin	OrgTicket	OrgWeight
FIELD	215912	N/A

Moisture	11.500
Test Weight	58.200
PPB	.0
Dry Weight %	100.00
Discount/100 LB	\$0.00
Dry Weight	60,380.00

**WEIGHTS****GROSS** 88,980.00**TARE** 28,600.00**NET** 60,380.00**METRIC TONS** 27.388

---

 Driver Signature

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 Weigher Signature: Everardo Villarreal

**Elevator Section**

**Garcia Grain Trading**  
**PROGRESO DIVISION**  
**Tel. No.: 956-565-2674**

**Transport Section**

**F & T**  
**RUDY CERDA**  
**DDY-F85**

**Customer Section**

**F & T FARM**  
**LOS WYNOS**

**Ticket In****74335**

v.2.7

**IN**

07/07/2022 10:53

**OUT**

07/07/2022 12:18

Product	Lot #
Yellow Corn	LOS WYNOS

Origin	OrgTicket	OrgWeight
FIELD	215913	N/A

Moisture	11.500
Test Weight	58.500
PPB	.0
Dry Weight %	100.00
Discount/100 LB	\$0.00
Dry Weight	56,300.00

**WEIGHTS****GROSS** 85,440.00**TARE** 29,140.00**NET** 56,300.00**METRIC TONS** 25.538

---

 Driver Signature

---

 Weigher Signature: J. ALFREDO TORRES

**Elevator Section**

**Garcia Grain Trading**  
**PROGRESO DIVISION**  
**Tel. No.: 956-565-2674**

**Transport Section**

**F & T**  
**RUDY CERDA**  
**DDY-F85**

**Customer Section**

**F & T FARM**  
**LOS WYNOS**

**Ticket In****74363**

v.2.7

**IN**

07/07/2022 14:57

**OUT**

07/07/2022 16:09

Product	Lot #
Yellow Corn	LOS WYNOS

Origin	OrgTicket	OrgWeight
FIELD	215914	N/A

Moisture	11.700
Test Weight	58.800
PPB	.0
Dry Weight %	100.00
Discount/100 LB	\$0.00
Dry Weight	53,660.00

**WEIGHTS****GROSS** 82,560.00**TARE** 28,900.00**NET** 53,660.00**METRIC TONS** 24.340

---

 Driver Signature

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 Weigher Signature: Everardo Villarreal



**Elevator Section**

**Garcia Grain Trading**  
**PROGRESO DIVISION**  
**Tel. No.: 956-565-2674**

**Transport Section**

**F & T**  
**RUDY CERDA**  
**DDY-F85**

**Customer Section**

**F & T FARM**  
**LOS WYNOS**

**Ticket In****74395**

v.2.7

**IN**

07/07/2022 18:10

**OUT**

07/07/2022 19:02

Product	Lot #
Yellow Corn	LOS WYNOS

Origin	OrgTicket	OrgWeight
FIELD	215915	N/A

Moisture	12.100
Test Weight	57.700
PPB	.0
Dry Weight %	100.00
Discount/100 LB	\$0.00
Dry Weight	56,120.00

**WEIGHTS****GROSS** 85,060.00**TARE** 28,940.00**NET** 56,120.00**METRIC TONS** 25.456

---

 Driver Signature

---

 Weigher Signature: Everardo Villarreal

**Elevator Section**

**Garcia Grain Trading**  
**PROGRESO DIVISION**  
**Tel. No.: 956-565-2674**

**Transport Section**

**F & T**  
**JAIME CANTU**  
**FDJ-J67**

**Customer Section**

**F & T FARM & CATTLE**  
**WASSER**

**Ticket In****74410**

v.2.7

**IN**

07/08/2022 08:29

**OUT**

07/08/2022 09:17

Product	Lot #
Yellow Corn	WASSER
Moisture	13.500
Test Weight	58.700
PPB	.0
Dry Weight %	100.00
Discount/100 LB	\$0.00
Dry Weight	57,920.00

Origin	OrgTicket	OrgWeight
FIELD	223051	

**WEIGHTS**

<b>GROSS</b>	<b>84,160.00</b>
<b>TARE</b>	<b>26,240.00</b>
<b>NET</b>	<b>57,920.00</b>
<b>METRIC TONS</b>	<b>26.272</b>

---

 Driver Signature

---

 Weigher Signature: J. ALFREDO TORRES

**Elevator Section**

Garcia Grain Trading  
 PROGRESO DIVISION  
 Tel. No.: 956-565-2674

**Transport Section**

F & T  
 RUDY CERDA  
 DDY-F85

**Customer Section**

F & T FARM  
 WASSER

**Ticket In****74431**

v.2.7

**IN**

07/08/2022 12:28

**OUT**

07/08/2022 13:15

Product	Lot #
Yellow Corn	WASSER

Moisture	12.300
Test Weight	57.200
PPB	.0
Dry Weight %	100.00
Discount/100 LB	\$0.00
Dry Weight	50,700.00

Origin	OrgTicket	OrgWeight
FIELD	215916	N/A

**WEIGHTS**

<b>GROSS</b>	<b>80,480.00</b>
<b>TARE</b>	<b>29,780.00</b>
<b>NET</b>	<b>50,700.00</b>
<b>METRIC TONS</b>	<b>22.997</b>

---

 Driver Signature

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 Weigher Signature: Everardo Villarreal

**Elevator Section**

**Garcia Grain Trading**  
**PROGRESO DIVISION**  
**Tel. No.: 956-565-2674**

**Transport Section**

**F & T**  
**JAIME CANTU**  
**FDJ-J67**

**Customer Section**

**F & T FARM**  
**WASSER**

**Ticket In****74436**

v.2.7

**IN**

07/08/2022 13:03

**OUT**

07/08/2022 13:32

Product	Lot #
Yellow Corn	WASSER
Moisture	12.200
Test Weight	57.100
PPB	.0
Dry Weight %	100.00
Discount/100 LB	\$0.00
Dry Weight	52,600.00

Origin	OrgTicket	OrgWeight
FIELD	223052	N/A

**WEIGHTS**

<b>GROSS</b>	<b>79,180.00</b>
<b>TARE</b>	<b>26,580.00</b>
<b>NET</b>	<b>52,600.00</b>
<b>METRIC TONS</b>	<b>23.859</b>

---

 Driver Signature

---

 Weigher Signature: J. ALFREDO TORRES

**Elevator Section**

Garcia Grain Trading  
 PROGRESO DIVISION  
 Tel. No.: 956-565-2674

**Transport Section**

F & T  
 RUDY CERDA  
 DDY-F85

**Customer Section**

F & T FARM  
 WASSER

**Ticket In****74462**

v.2.7

**IN**

07/08/2022 15:47

**OUT**

07/08/2022 16:50

Product	Lot #
Yellow Corn	WASSER
Moisture	12.300
Test Weight	57.700
PPB	.0
Dry Weight %	100.00
Discount/100 LB	\$0.00
Dry Weight	52,900.00

Origin	OrgTicket	OrgWeight
FIELD	215917	N/A

**WEIGHTS**

<b>GROSS</b>	<b>82,580.00</b>
<b>TARE</b>	<b>29,680.00</b>
<b>NET</b>	<b>52,900.00</b>
<b>METRIC TONS</b>	<b>23.995</b>

---

 Driver Signature

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 Weigher Signature: Everardo Villarreal

**Elevator Section**

**Garcia Grain Trading**  
**PROGRESO DIVISION**  
**Tel. No.: 956-565-2674**

**Transport Section**

**F & T**  
**RUDY CERDA**  
**DDYF85**

**Customer Section**

**F & T FARM**  
**ISSAC / CASTILLO**

**Ticket In****74495**

v.2.7

**IN**

07/08/2022 19:18

**OUT**

07/08/2022 20:16

Product	Lot #
Yellow Corn	ISSAC / CASTILLO

Origin	OrgTicket	OrgWeight
FIELD	215918	N/A

Moisture	12.400
Test Weight	57.700
PPB	.0
Dry Weight %	100.00
Discount/100 LB	\$0.00
Dry Weight	64,020.00

**WEIGHTS**

<b>GROSS</b>	<b>93,600.00</b>
<b>TARE</b>	<b>29,580.00</b>
<b>NET</b>	<b>64,020.00</b>
<b>METRIC TONS</b>	<b>29.039</b>

---

 Driver Signature

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 Weigher Signature: Everardo Villarreal

**Elevator Section**

**Garcia Grain Trading**  
**PROGRESO DIVISION**  
**Tel. No.: 956-565-2674**

**Transport Section**

**F & T**  
**RUDY CERDA**  
**DDY-F05**

**Customer Section**

**F & T FARM & CATTLE**  
**26761**

**Ticket In****74627**

v.2.7

Product	Lot #
Yellow Corn	26761
Moisture	11.400
Test Weight	54.900
PPB	.0
Dry Weight %	100.00
Discount/100 LB	\$0.00
Dry Weight	61,820.00

IN	OUT
07/10/2022 18:32	07/10/2022 18:58

Origin	OrgTicket	OrgWeight
FIELD	215923	

**WEIGHTS**

<b>GROSS</b>	<b>90,840.00</b>
<b>TARE</b>	<b>29,020.00</b>
<b>NET</b>	<b>61,820.00</b>
<b>METRIC TONS</b>	<b>28.041</b>

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 Driver Signature

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 Weigher Signature: ALFREDO TORRES

**Elevator Section**

**Garcia Grain Trading**  
**PROGRESO DIVISION**  
**Tel. No.: 956-565-2674**

**Transport Section**

**F & T**  
**JAIME CANTU**  
**FDJ-J67**

**Customer Section**

**F & T FARM & CATTLE**  
**FLOODWAY**

**Ticket In****74656**

v.2.7

**IN**

07/11/2022 16:26

**OUT**

07/11/2022 16:56

Product	Lot #
Yellow Corn	FLOODWAY

Origin	OrgTicket	OrgWeight
FIELD	223067	

Moisture	10.800
Test Weight	59.900
PPB	.0
Dry Weight %	100.00
Discount/100 LB	\$0.00
Dry Weight	59,780.00

**WEIGHTS****GROSS** 85,960.00**TARE** 26,180.00**NET** 59,780.00**METRIC TONS** 27.116

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 Driver Signature

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 Weigher Signature: J. ALFREDO TORRES



**Elevator Section**

**Garcia Grain Trading**  
**PROGRESO DIVISION**  
**Tel. No.: 956-565-2674**

**Transport Section**

**JC TRANSPORT**  
**JORGE CANTU**  
**X36-893**

**Customer Section**

**F & T FARM & CATTLE**  
**FLOODWAY**

**Ticket In****74657**

v.2.7

**IN**

07/11/2022 16:35

**OUT**

07/11/2022 17:13

Product	Lot #
Yellow Corn	FLOODWAY

Moisture	10.200
Test Weight	56.800
PPB	.0
Dry Weight %	100.00
Discount/100 LB	\$0.00
Dry Weight	63,220.00

Origin	OrgTicket	OrgWeight
FIELD	223066	

**WEIGHTS**

<b>GROSS</b>	<b>91,600.00</b>
<b>TARE</b>	<b>28,380.00</b>
<b>NET</b>	<b>63,220.00</b>
<b>METRIC TONS</b>	<b>28.676</b>

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 Driver Signature

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 Weigher Signature: J. ALFREDO TORRES

**Elevator Section**

**Garcia Grain Trading**  
**PROGRESO DIVISION**  
**Tel. No.: 956-565-2674**

**Transport Section**

**F & T**  
**RUDY CERDA**  
**DDY-F85**

**Customer Section**

**F & T FARM & CATTLE**  
**FLOODWAY**

**Ticket In****74660**

v.2.7

**IN**

07/11/2022 17:15

**OUT**

07/11/2022 17:40

Product	Lot #
Yellow Corn	FLOODWAY

Origin	OrgTicket	OrgWeight
FIELD	215926	

Moisture	10.600
Test Weight	60.000
PPB	.0
Dry Weight %	100.00
Discount/100 LB	\$0.00
Dry Weight	63,640.00

**WEIGHTS**

<b>GROSS</b>	<b>92,760.00</b>
<b>TARE</b>	<b>29,120.00</b>
<b>NET</b>	<b>63,640.00</b>
<b>METRIC TONS</b>	<b>28.867</b>

---

 Driver Signature

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 Weigher Signature: J. ALFREDO TORRES

**Elevator Section**

**Garcia Grain Trading**  
**PROGRESO DIVISION**  
**Tel. No.: 956-565-2674**

**Transport Section**

**F & T**  
**JAIME CANTU**  
**FDJ-J67**

**Customer Section**

**F & T FARM & CATTLE**  
**FLOODWAY**

**Ticket In****74673**

v.2.7

Product	Lot #
Yellow Corn	FLOODWAY
Moisture	10.500
Test Weight	58.800
PPB	.0
Dry Weight %	100.00
Discount/100 LB	\$0.00
Dry Weight	62,540.00

IN	OUT
07/12/2022 09:46	07/12/2022 10:19

Origin	OrgTicket	OrgWeight
FIELD	223068	N/A

**WEIGHTS**

<b>GROSS</b>	<b>88,380.00</b>
<b>TARE</b>	<b>25,840.00</b>
<b>NET</b>	<b>62,540.00</b>
<b>METRIC TONS</b>	<b>28.368</b>

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 Driver Signature

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 Weigher Signature: ALFREDO TORRES

**Elevator Section**

**Garcia Grain Trading**  
**PROGRESO DIVISION**  
**Tel. No.: 956-565-2674**

**Transport Section**

**JC TRANSPORT**  
**JORGE CANTU**

**Customer Section**

**F & T FARM & CATTLE**  
**FLOODWAY**

**Ticket In****74683**

v.2.7

Product	Lot #
Yellow Corn	FLOODWAY
Moisture	10.500
Test Weight	59.000
PPB	.0
Dry Weight %	100.00
Discount/100 LB	\$0.00
Dry Weight	67,940.00

IN	OUT
07/12/2022 11:49	07/12/2022 12:23

Origin	OrgTicket	OrgWeight
FIELD	223069	N/A

**WEIGHTS**

<b>GROSS</b>	<b>96,300.00</b>
<b>TARE</b>	<b>28,360.00</b>
<b>NET</b>	<b>67,940.00</b>
<b>METRIC TONS</b>	<b>30.817</b>

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 Driver Signature

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 Weigher Signature: Everardo Villarreal

**Elevator Section**

**Garcia Grain Trading**  
**PROGRESO DIVISION**  
**Tel. No.: 956-565-2674**

**Transport Section**

**F & T**  
**RUDY CERDA**  
**DDY-F85**

**Customer Section**

**F & T FARM & CATTLE**  
**FLOODWAY**

**Ticket In****74693**

v.2.7

Product	Lot #
Yellow Corn	FLOODWAY
Moisture	11.700
Test Weight	57.800
PPB	.0
Dry Weight %	100.00
Discount/100 LB	\$0.00
Dry Weight	64,580.00

IN	OUT
07/12/2022 13:10	07/12/2022 14:02

Origin	OrgTicket	OrgWeight
FIELD	215927	N/A

**WEIGHTS**

<b>GROSS</b>	<b>93,620.00</b>
<b>TARE</b>	<b>29,040.00</b>
<b>NET</b>	<b>64,580.00</b>
<b>METRIC TONS</b>	<b>29.293</b>

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 Driver Signature

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 Weigher Signature: ALFREDO TORRES

**Elevator Section**

**Garcia Grain Trading**  
**PROGRESO DIVISION**  
**Tel. No.: 956-565-2674**

**Transport Section**

**F & T**  
**JAIME CANTU**  
**FDJ-J67**

**Customer Section**

**F & T FARM & CATTLE**  
**FLOODWAY**

**Ticket In****74701**

v.2.7

**IN**

07/12/2022 14:26

**OUT**

07/12/2022 16:11

Product	Lot #
Yellow Corn	FLOODWAY

Origin	OrgTicket	OrgWeight
FIELD	223070	N/A

Moisture	12.000
Test Weight	59.600
PPB	.0
Dry Weight %	100.00
Discount/100 LB	\$0.00
Dry Weight	63,880.00

**WEIGHTS**

<b>GROSS</b>	<b>89,700.00</b>
<b>TARE</b>	<b>25,820.00</b>
<b>NET</b>	<b>63,880.00</b>
<b>METRIC TONS</b>	<b>28.976</b>

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 Driver Signature

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 Weigher Signature: ALFREDO TORRES

**Elevator Section**

**Garcia Grain Trading**  
**PROGRESO DIVISION**  
**Tel. No.: 956-565-2674**

**Transport Section**

**JC TRANSPORT**  
**JORGE CANTU**

**Customer Section**

**F & T FARM & CATTLE**  
**FLOODWAY**

**Ticket In****74721**

v.2.7

**IN**

07/12/2022 16:13

**OUT**

07/12/2022 17:41

Product	Lot #
Yellow Corn	FLOODWAY

Origin	OrgTicket	OrgWeight
FIELD	223071	N/A

Moisture	10.900
Test Weight	59.700
PPB	.0
Dry Weight %	100.00
Discount/100 LB	\$0.00
Dry Weight	74,980.00

**WEIGHTS**

<b>GROSS</b>	<b>103,240.00</b>
<b>TARE</b>	<b>28,260.00</b>
<b>NET</b>	<b>74,980.00</b>
<b>METRIC TONS</b>	<b>34.011</b>

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 Driver Signature

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 Weigher Signature: Everardo Villarreal

**Elevator Section**

**Garcia Grain Trading**  
**PROGRESO DIVISION**  
**Tel. No.: 956-565-2674**

**Transport Section**

**F & T**  
**RUDY CERDA**  
**DDY-F85**

**Customer Section**

**F & T FARM & CATTLE**  
**FLOODWAY**

**Ticket In****74760**

v.2.7

**IN**

07/12/2022 19:02

**OUT**

07/13/2022 00:04

Product	Lot #
Yellow Corn	FLOODWAY

Origin	OrgTicket	OrgWeight
FIELD	215928	N/A

Moisture	11.500
Test Weight	58.900
PPB	.0
Dry Weight %	100.00
Discount/100 LB	\$0.00
Dry Weight	60,400.00

**WEIGHTS**

<b>GROSS</b>	<b>89,180.00</b>
<b>TARE</b>	<b>28,780.00</b>
<b>NET</b>	<b>60,400.00</b>
<b>METRIC TONS</b>	<b>27.397</b>

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 Driver Signature

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 Weigher Signature: Everardo Villarreal



**Elevator Section**

**Garcia Grain Trading**  
**PROGRESO DIVISION**  
**Tel. No.: 956-565-2674**

**Transport Section**

**F & T**  
**JAIME CANTU**  
**FDJ-J67**

**Customer Section**

**F & T FARM & CATTLE**  
**FLOODWAY**

**Ticket In****74764**

v.2.7

Product	Lot #
Yellow Corn	FLOODWAY
Moisture	11.500
Test Weight	60.600
PPB	.0
Dry Weight %	100.00
Discount/100 LB	\$0.00
Dry Weight	60,460.00

IN	OUT
07/12/2022 19:49	07/13/2022 00:16

Origin	OrgTicket	OrgWeight
NO FIELD	NO FIELD	N/A

**WEIGHTS**

<b>GROSS</b>	<b>86,140.00</b>
<b>TARE</b>	<b>25,680.00</b>
<b>NET</b>	<b>60,460.00</b>
<b>METRIC TONS</b>	<b>27.424</b>

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 Driver Signature

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 Weigher Signature: Everardo Villarreal

**Elevator Section**

**Garcia Grain Trading**  
**PROGRESO DIVISION**  
**Tel. No.: 956-565-2674**

**Transport Section**

**F & T**  
**JAIME CANTU**  
**FDJ-J67**

**Customer Section**

**F & T FARM & CATTLE**  
**FLOODWAY**

**Ticket In****74814**

v.2.7

**IN**

07/13/2022 13:22

**OUT**

07/13/2022 14:16

Product	Lot #
Yellow Corn	FLOODWAY

Origin	OrgTicket	OrgWeight
FIELD	223074	

Moisture	12.000
Test Weight	60.200
PPB	.0
Dry Weight %	100.00
Discount/100 LB	\$0.00
Dry Weight	58,880.00

**WEIGHTS****GROSS** 84,940.00**TARE** 26,060.00**NET** 58,880.00**METRIC TONS** 26.708

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 Driver Signature

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 Weigher Signature: ALFREDO TORRES

**Elevator Section**

**Garcia Grain Trading**  
**PROGRESO DIVISION**  
**Tel. No.: 956-565-2674**

**Transport Section**

**F & T**  
**RUDY CERDA**  
**DDY-F85**

**Customer Section**

**F & T FARM & CATTLE**  
**FLOODWAY**

**Ticket In****74848**

v.2.7

**IN**

07/13/2022 20:16

**OUT**

07/13/2022 21:00

Product	Lot #
Yellow Corn	FLOODWAY

Moisture	10.700
Test Weight	59.200
PPB	.0
Dry Weight %	100.00
Discount/100 LB	\$0.00
Dry Weight	66,160.00

Origin	OrgTicket	OrgWeight
FIELD	215930	

**WEIGHTS****GROSS** 95,500.00**TARE** 29,340.00**NET** 66,160.00**METRIC TONS** 30.010

---

 Driver Signature

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 Weigher Signature: ALFREDO TORRES

**GARCIA GRAIN TRADING, CORP.****FARMERS SEED & FERTILIZER 2022****FARMER NAME:**

FARMER NAME	FECHA	INV	PRODUCT	QUANTITY	PRICE	TOTAL	PAID	BALANCE
FAUSTO SALINAS	5/25/2022	52947910	TRANFORM WG	16	140.91	\$ 2,254.51	19196	HELENA
FAUSTO SALINAS	5/25/2022	52947910	MEPEX (2 X 2.5 G	10	14.20	\$ 142.04	19196	HELENA
FAUSTO SALINAS	12/30/2022	52950436	ROUNDUP POWE	265	56.82	\$ 15,056.57	19273	HELENA
FAUSTO SALINAS	12/30/2022	52950436	SHARPEN (2 X 1 C	4	863.62	\$ 3,454.49	19273	HELENA
FAUSTO SALINAS	12/30/2022	52950436	PEAK (GOWAN12	480	21.31	\$ 10,227.11	19273	HELENA
			FAUSTO SALINAS			\$ 31,134.72		

**Richard S. Schmidt**

United States Bankruptcy Judge (retired)  
615 Leopard St. Suite 635  
Corpus Christi, TX 78401

361-244-9333

rss@judgerss.com

November 6, 2023

***Via First Class Mail To:***

Fausto Salinas and F&T Farms & Cattle Co.  
P.O. Box 308  
Sullivan City, Texas 78595

***Via First Class Mail To:***

F&T Farms & Cattle Co.  
c/o Fausto Salinas  
2104 Western Rd  
Mission, Texas, 78572-8990

RE: Request for payment of unpaid debt in relation to Garcia Grain's delivery of seed, fertilizer, and/or agricultural chemicals to Fausto Salinas and F&T Farms & Cattle Co. between February 24, 2022 and September 28, 2022 for Invoice No. 19538 (in the amount of \$63,138.55) totaling **\$63,138.55**

Dear Fausto Salinas and F&T Farms & Cattle Co.:

This letter is in relation to your unpaid debt to Garcia Grain Trading Corporation ("**Garcia Grain**"). On February 17, 2023 (the "**Petition Date**"), Garcia Grain filed its voluntary petition for relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. § 101, *et seq.* (the "**Bankruptcy Code**"). The Bankruptcy Case styled and numbered *In re: Garcia Grain Trading Corporation*; Case No. 23-70028-EVR-11 in the U.S. Bankruptcy Court for the Southern District of Texas, McAllen Division. I have been appointed by the United States Bankruptcy Court as a Chief Restructuring Officer ("**CRO**") for Garcia Grain in its Bankruptcy Case.

I am writing to you on behalf of Garcia Grain to demand payment of the amounts due and owing to Garcia Grain for the seed, fertilizer, and/or agricultural chemicals sold by Garcia Grain to you, Mr. Fausto Salinas, and your company, F&T Farms & Cattle Co. ("**Fausto Salinas and F&T Farms & Cattle Co.**") between February 24, 2022 and September 28, 2022. In exchange for the goods and services provided, you and Fausto Salinas and F&T Farms & Cattle Co. agreed to pay Garcia Grain **\$63,138.55** (the "**Claim Amount**").

This letter and the enclosed copy of the summary sheet and a true and correct copy of **Invoice No. 19538** (in the amount of \$63,138.55) showing unpaid charges for Garcia Grain's delivery of seed, fertilizer, and/or agricultural chemicals to Fausto Salinas and F&T Farms & Cattle Co. totaling **\$63,138.55** (enclosed hereto as "**Exhibit A**") are being sent to you to demand the amount that has accrued and is past due according to your agreement with Garcia Grain.

If you will forward to the undersigned the amount of **\$63,138.55** (the "**Claim Amount**") within thirty (30) days of this letter, we can all then put this matter to rest. If you fail to forward

Fausto Salinas and F&T Farms & Cattle Co.  
November 6, 2023  
Page 2

the Claim Amount or otherwise respond to this letter within thirty (30) days, we will have to immediately initiate a lawsuit in the United States Bankruptcy Court to collect this debt. If that happens, in accordance with the Texas Civil Practice and Remedies Code § 38.001 *et seq.* you will be liable for the attorney's fees and costs of collecting this debt in addition to the Claim Amount. In the event that we obtain judgment against you, that judgment will continue to accrue interest at the statutory rate until fully paid.

Should you have any questions concerning this claim, please contact me.

Yours very truly,

---

Richard S. Schmidt, the Chief Restructuring  
Officer for Garcia Grain Trading  
Corporation

cc:  
Enclosures as stated



Jose W. Hernandez  
[jwh@jwhernandezlaw.com](mailto:jwh@jwhernandezlaw.com)

Law Office of  
**JOSE W. HERNANDEZ, PLLC**  
Attorney - Mediator

206 W Stubbs Street  
Edinburg, Texas 78539  
(956) 603-2058  
(fax) 956-467-4571

January 18, 2024

**VIA EMAIL [rss@judgerss.com](mailto:rss@judgerss.com) AND FIRST CLASS MAIL**

Judge Richard S Schmidt  
615 Leopard Street. Suite 635  
Corpus Christi, Texas 78401

Re: *Dispute of Debt and Request for Account History- Fausto Salinas and F&T Farms & Cattle Co.- Invoice 19538*

Dear Judge Schmidt:

Thank you for your last response with the supporting documents that support Garcia Grain claim against F&T Farms. After review on the documents provided, my client asserts that all balances owed for these invoices were paid to Garcia Grain by F&T Farms at the time of its yearly disbursement.


My client has advised me that Garcia Grain would withdraw all owed invoices prior to F&T Farms receiving the final payment by Garcia Grain. My client asserts that Invoices 52949126, 52949673, 19092, 19194, 19211, and 19243 and the payment for these invoices were retained by Garcia Grain prior to F&T Farms receiving their payment for deliveries to Garcia Grain.

In order to clear this confusing into the F&T Farms account with Garcia Grain, my client is requesting an account history for the last 5 years to include the following:

1. All documents showing deliveries by F&T Farms to Garcia Grain;
2. All documents showing payments for F&T Farms deliveries to Garcia Grain;
3. All invoices paid on behalf of F&T Farms to any third party for product delivered to F&T Farms; and
4. All checks made to F&T Farms by Garcia Grain.

Thank you for your attention to this matter. If you have any questions, please contact my office.

Sincerely,



Jose W. Hernandez